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8 **UNITED STATES DISTRICT COURT**  
9 **DISTRICT OF NEVADA**

10 UNITED STATES OF AMERICA,  
11 Plaintiff,  
12  
13 v.  
14 EMERALD RUTH WILSON-BEY,  
15 Defendant.

Case No. 2:21-cr-00306-GMN-NJK

**STIPULATION TO CONTINUE**  
**MOTION HEARING**  
(First Request)

16  
17 IT IS HEREBY STIPULATED AND AGREED, by and between Christopher Chiou,  
18 Acting United States Attorney, and Jim W. Fang, Assistant United States Attorney, counsel for  
19 the United States of America, and Rene L. Valladares, Federal Public Defender, and Keisha K.  
20 Matthews, Assistant Federal Public Defender, counsel for Emerald Ruth Wilson-Bey, that the  
21 Motion Hearing currently scheduled on March 23, 2022, be vacated and continued to a date and  
22 time convenient to the Court, but no sooner than one week (7) days.

23 This Stipulation is entered into for the following reasons:

24 1. Defense counsel has a video visit scheduled for March 23, 2022 with Ms.  
25 Wilson-Bey. Counsel requests additional time for this hearing to see if the litigation of the pro  
26 se motion for new counsel will still be necessary after meeting with Ms. Wilson-Bey.

2. The defendant is in custody and agrees with the need for the continuance.

3. The parties agree to the continuance.

This is the first request for a continuance of the motion hearing.

DATED this 16th day of March, 2022.

RENE L. VALLADARES  
Federal Public Defender

CHRISTOPHER CHIOU  
Acting United States Attorney

*/s/ Keisha K. Matthews*  
By \_\_\_\_\_

KEISHA K. MATTHEWS  
Assistant Federal Public Defender

*/s/ Jim W. Fang*  
By \_\_\_\_\_

JIM W. FANG  
Assistant United States Attorney

UNITED STATES OF AMERICA,  
Plaintiff,  
v.  
EMERALD RUTH WILSON-BEY,  
Defendant.

(Docket No. 33)

  
UNITED STATES MAGISTRATE JUDGE